

# EXHIBIT 14

**SECTION 4.11(a)**  
**LICENSING AND DATA SECURITY**

The matters disclosed under Section 4.14 of this Disclosure Memorandum are incorporated into this Section 4.11(a).

**Active State Exams – With Findings**

Below are the results of state exam reports that allege violations or findings of non-compliance:

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
California	GMAC Mortgage dba ditech	02/01/2010 – 01/31/2011	<ul style="list-style-type: none"> <li>• Failure to comply with due diligence requirements with CA Section 2923.50 (SB1137).</li> <li>• Notice of Sale on one loan was filed one day early.</li> <li>• Two loans where amounts on Notice of Default were overstated.</li> <li>• Incorrect contact date due to formatting error on Notice of Default – 2 loans.</li> <li>• SCRA – 1 loan where payments calculated incorrectly, missing sufficient evidence in file of borrower's military status. SCRA Notice not imaged in loan files.</li> <li>• Deviations from HAMP Guidelines – 5 loans.</li> <li>• Loan Brokerage Agreement – agreement not approved by the commissioner.</li> </ul>	<ul style="list-style-type: none"> <li>• Corrective action requested #5: Option Letter to be updated to include that SCRA insert included with letter, per A. Fleitas. Updated letters went into production on 04/27/12.</li> </ul> <p>Corrective Action Completion Date: 04/27/2012</p>
California	GMAC Mortgage dba ditech (Finance Lender License)	10/01/2008 – 10/01/2011	<ul style="list-style-type: none"> <li>• Officers/directors on file with CA DOC are no longer with the company. Records not updated accurately.</li> </ul>	
District of Columbia	GMAC Mortgage dba ditech	09/01/2008 – 10/01/2010	<ul style="list-style-type: none"> <li>• One loan cited for overstatement of fees and costs.</li> <li>• Several loans that require review of disclosure calculations and limitations on the TIL Disclosure.</li> <li>• Previous exam findings – Interest Rate Lock Agreement, Commitment Letter and Financing Agreement.</li> <li>• Recording of new Credit Line DOT on loan modifications.</li> <li>• Re-consideration of 1 HFN loan with DTI&lt;50% at origination.</li> <li>• Two loans with overstated fees on Right to Cure Notices.</li> </ul>	

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
Illinois	GMAC Mortgage	09/01/2009 to 06/30/2011	<p>Origination related findings:</p> <ul style="list-style-type: none"> <li>• Unlicensed activity – 2 employees</li> <li>• Anti-Predatory Lending Database – 11 loans either not entered or entered late into database.</li> <li>• Failed to secure verification of income on two files.</li> <li>• Missing documents on seven files.</li> <li>• Blank in one document – borrower e-signed.</li> <li>• Loan log – did not contain seller name, appraiser name, license number and closing location.</li> </ul> <p>Servicing related findings:</p> <ul style="list-style-type: none"> <li>• Failure to provide a grace period notice.</li> <li>• Failure to provide payment instructions.</li> <li>• Failure to provide an initial escrow account disclosure statement and/or executed waiver of escrow.</li> </ul>	<p>Corrective Actions Requested:</p> <p><u>Origination:</u></p> <p>a) Anti-Predatory Lending Database: identify on a weekly basis 100% of loans in pipeline in Cook, Kane, Will and Peoria counties to confirm that database entries have occurred and the resulting Certificates are immediately uploaded to our internal imaging system.</p> <p>b.) Republish CSM-081.</p> <p>c.) Enhance requirements in Consumer Lending P&amp;Ps.</p> <p>d.) Work with closing agent to ensure that GMACM as the loan originator, which is not exempt, issues Certificates of Compliance (not exemptions).</p> <p>04/10/12 – Status Update: Testing completed on Anti-Predatory Lending Database.</p> <p>• Broker/Origination Loan Log:</p> <p>a.) Needs to include seller name, appraiser name, appraiser license number and closing location.</p> <p>Awaiting response from state on clarification of closing location.</p> <p>04/10/12 – Status Update: Awaiting response from state on definition.</p> <p><u>Servicing:</u></p> <ul style="list-style-type: none"> <li>• Grace Period Notice was not being sent to borrowers with an inactive bankruptcy status. All loans except active bankruptcy accounts will receive the GPN.</li> </ul> <p>Corrective Action Completion Date: 04/10/12</p> <ul style="list-style-type: none"> <li>• Failure to provide payment instructions – Elaine Kanter has proposed that they provide a separate letter for all Illinois borrowers, which would contain the required RESPA information and the Illinois requirements. With respect to the three payments, we can only provide the precise amount of the payment on a fixed rate non-</li> </ul>

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				<p>escrowed loan. Therefore, we would provide an explanation to the borrower stating that if theirs is an ARM loan or if their payment includes an amount for escrows, that there may be changes not reflected in the amounts disclosed on the notice. The servicing transfer/welcome letter failed to include the name and address of the primary regulatory authority having jurisdiction over the residential lending activities of the entity to which payments are to be sent.</p> <p>Corrective Action Completion Date: Corrective Action Owner: M. Mascorro</p> <ul style="list-style-type: none"> <li>Failure to provide an initial escrow account disclosure statement or the executed waiver of escrow.</li> </ul> <p>Corrective Action Completion Date: Corrective Action Owner: Carrie D'Alonzo</p>
Illinois	GMAC Mortgage dba ditech	07/01/2008 to 02/28/2011	<ul style="list-style-type: none"> <li>12 loan officers originated 16 loans – unlicensed activity.</li> <li>Appraisal policy – files do not include documentation to show that borrower received a copy of appraisal prior to closing.</li> <li>Failure to provide adequate surety bond.</li> <li>Advertising – advertisements do not include “Illinois Residential Mortgage Licensee”.</li> <li>1 loan missing disclosure</li> <li>6 loan applications not signed by loan officers.</li> </ul>	
Illinois	Residential Funding Company, LLC	01/01/2009 – 11/30/2011	<ul style="list-style-type: none"> <li>Bond of Licensee – bond was current upon submission of examination materials. Renewal bond received had error in date. Bonding company has updated.</li> <li>Averments of Licensee – Repurchase Reporting.</li> </ul>	Repurchase Reporting – Project Team being developed.
Kentucky	GMAC Mortgage – Originations	1/1/2007 – 11/30/2009	<ul style="list-style-type: none"> <li>Unlicensed loan officers</li> <li>Unlicensed processors</li> </ul>	

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
			<ul style="list-style-type: none"> <li>• Limitations on loan origination fees</li> <li>• Recordkeeping</li> <li>• Failure to use unique NMLS id #</li> <li>• Notice of Right to Appraisal</li> </ul>	
Kentucky	GMACM - Origination	09/21/2009 – 12/31/2011	<p>Preliminary findings:</p> <ul style="list-style-type: none"> <li>• Several unregistered processors and unregistered loan officers.</li> <li>• Recordkeeping – No disbursement records or loan conditions/stipulations in origination files.</li> <li>• No Hello letters in servicing files. Several foreclosure files missing signed Judgments or Affidavits.</li> <li>• Deceptive Practice – Couple of files are being charged a 5% late charge when the note only provides for 4%.</li> </ul>	
Kentucky	GMACM – Servicing	09/21/2009 – 01/23/2012	<p>Preliminary findings:</p> <ul style="list-style-type: none"> <li>• Several unregistered processors and unregistered loan officers.</li> <li>• Recordkeeping – No disbursement records or loan conditions/stipulations in origination files.</li> <li>• No Hello letters in servicing files. Several foreclosure files missing signed Judgments or Affidavits.</li> <li>• Deceptive Practice – Couple of files are being charged a 5% late charge when the note only provides for 4%.</li> </ul>	
Michigan	GMAC Mortgage, LLC	12/01/2009 – 12/01/2011	<ul style="list-style-type: none"> <li>• Late charges not included on 1098 statements.</li> </ul>	<ul style="list-style-type: none"> <li>• Late charges to be added on 1098 statements.</li> </ul>
New Hampshire	GMAC Mortgage, LLC	03/01/2010 – 09/28/2011	<ul style="list-style-type: none"> <li>• Overcharge of an appraisal fee of \$70.00. Refund has already been made to the consumer.</li> <li>• Inaccurate annual report filing. Licensing had corrected the report and submitted to the NH Banking Department.</li> </ul>	
New York	GMAC Mortgage dba ditech	6/1/2007 – 12/31/2009	<p>Five (5) matters requiring attention:</p> <ul style="list-style-type: none"> <li>• Address internal control weaknesses related to mortgage operations activities.</li> <li>• Centralized Application Log must comply with NY regulations. VOOR report must be supported</li> </ul>	<p>Corrective actions requested:</p> <ul style="list-style-type: none"> <li>• Centralized Application Log to be properly checked for review, accuracy and signed by entity president.</li> </ul>

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
			<p>by documentation, and management to ensure accuracy prior to signature and filing.</p> <ul style="list-style-type: none"> <li>• Quality Assurance – ensure adequate review of disclosures and commitment requirements.</li> <li>• Strengthen disaster recovery /business recovery testing in accordance with GLBA 501b requirements.</li> <li>• Address licensee's financial profitability and losses experiences over the past 3 years. Include projections based on stable as well volatile economic conductions. Address liquidity concerns and capital needs.</li> </ul>	<p>Corrective Action Completion Date: 01/13/2012.</p> <ul style="list-style-type: none"> <li>• Notification of branch closing: Licensing to update policies and procedures to include all surrender documentation required on the NMLS checklist.</li> </ul> <p>Corrective Action Completion Date: 12/08/2011</p> <ul style="list-style-type: none"> <li>• Fee discrepancies noted between GFE, HUD1 and the prevailing rate commitment. Refunds to be issued.</li> </ul> <p>Corrective Action Completion Date: 02/24/2012</p>
New York (cont'd)	GMAC Mortgage dba ditech	6/1/2007 – 12/31/2009	<p>Violations:</p> <ul style="list-style-type: none"> <li>• Fee collected under Ditech – no pricing policy or rate sheets in file.</li> <li>• Fee discrepancies between GFE, HUD-1 and rate commitment.</li> <li>• Lock-in agreement specifies lock-in deposit. Although the deposit is not charged until the loan is accepted, licensee should not charge a deposit.</li> <li>• Commitment agreements not properly issued.</li> <li>• Rate lock period expires less than 7 days after issuance and a rate lock extension fee was applied.</li> <li>• Interest rate-lock agreement of one borrower was not signed by Licensee.</li> <li>• Mortgage loans where loan officers did not sign the 1003 applications.</li> <li>• Locked interest rate agreements were not properly delivered to applicants.</li> <li>• Files missing pre-application disclosures.</li> <li>• GFEs' not disclosed within 3-day period.</li> <li>• TIL not issued within 3 day period.</li> </ul>	

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
			<ul style="list-style-type: none"> <li>Failed to properly issue the Notice to Home Loan Applicant.</li> <li>Failed to maintain records used to verify the borrower's identity.</li> <li>Failed to properly disclose Privacy Notice.</li> </ul>	
New York (Multi-State)	GMAC Mortgage, LLC	Varies	<ul style="list-style-type: none"> <li>Missing documents/electronic files</li> <li>MERS</li> <li>Fees displayed on website</li> <li>HAMP – Net Present Value Test missing from file.</li> <li>Missing hello/goodbye letters</li> <li>Timely escrow analysis statements</li> </ul>	
Ohio	GMAC Mortgage, LLC – Origination and Servicing	TBD		
Tennessee	GMAC Mortgage dba ditech – Origination and Servicing	5/1/2008 – 6/1/2010	<ul style="list-style-type: none"> <li>Servicing and collecting interest in excess of the maximum rate allowed by law (Home Loan Rate) on 418 loans.</li> <li>Servicing and collecting interest in excess of the maximum rate allowed by law (Formula Rate) on 181 loans.</li> <li>Servicing adjustable rate HELOC loans in which the rate adjustments over the loan term resulted in an interest rate that exceeded the max. rate allowed by law (Formula Rate) at the time of the adj - 68 loans.</li> <li>Failed to maintain complete books and records for mortgage servicing transactions - 11 accounts where examiner could not determine that the loans in question were being serviced at the proper rate of interest, or whether these loans were in violation of federal laws.</li> <li>Licensee unable to provide 517 files requested for review. GMAC had attempted to obtain these files, but they were unobtainable.</li> <li>Licensee failed to maintain copies of disbursement checks on loans where GMACM was the broker and/or lender - 6 accounts.</li> </ul>	

State	Entity	Exam Coverage Period	Issues/Findings	Corrective Action Tracking/Ownership/Validation (if applicable)
			<ul style="list-style-type: none"> <li>Licensee charged fees in excess of 2% on 48 second mortgage loans. Some of the origination fees ranged from 10% to 18%.</li> <li>Licensee made 41 section 32 loans. Section 32 disclosures were missing from the loan file.</li> <li>Licensee failed to include the loan originator license number as well as the broker license number and the NMLS unique identifier on applications where GMACM was the broker.</li> </ul>	
Tennessee	Residential Funding Company, LLC	08/01/2009 – 09/30/0211		
Texas	GMAC Mortgage, LLC	04/06/2012 – 06/15/2012		
Texas	Residential Funding Company/GMAC Mortgage	11/1/2005 – 11/1/2009	<ul style="list-style-type: none"> <li>15 of 53 loans reviewed had speed pay fees.</li> </ul>	
Vermont	GMAC Mortgage, LLC			
West Virginia	GMAC Mortgage, LLC dba ditech	07/01/2008 – 04/30/2011	<ul style="list-style-type: none"> <li>1 &amp; 2 - Implementation of policies &amp; procedures to produce loan servicing documentation in a timely manner and to provide all loan servicing documentation as required under WV code.</li> <li>Repeat violation of charging prohibited fees. Self-audit is requested.</li> <li>Failure to provide evidence that notification of certain advances made were made to the borrower within a reasonable time. Self-audit is requested.</li> <li>Notarization of breach letters. Repeat finding.</li> <li>Collection letters to WV borrowers included language that was perceived as fraudulent, deceptive and misleading. Self-audit of collection letters is requested.</li> </ul>	<p>Corrective Actions Requested:</p> <ul style="list-style-type: none"> <li>Policies and procedures on document repository database.</li> <li>Record Retention of Monthly Account Statements. Increase from 12 month to 36 rolling basis.</li> </ul> <p>04/23/2012 - Corrective Action Completion Date</p> <ul style="list-style-type: none"> <li>Collection letters Self-Audit: audit conducted resulted in several letters requiring amendment and the requirement to create several new letters.</li> </ul> <p>04/23/2012 – Per Amy Fleitas, letters in process of being sent to Legal &amp; Compliance for review prior to being submitted.</p>
Multi-State Foreclosure Exam	GMAC Mortgage, LLC	Varies		

**SECTION 4.11(b)**  
**LICENSING AND DATA SECURITY**

With respect to unsecured loans that GMACM has originated, such mortgage loans fall into two categories:

- 1) Loss Mitigation unsecured promissory notes (for balances due after deed in lieu or short sale or HUD partial claim)

These loans were originated in either GMACM's name, in the name of a mortgage insurer company as lender or HUD. HUD services the partial claim notes and that ETS services the remaining unsecured loss mitigation notes. Based on a potential lack of proper licensing, ETS has stopped servicing the unsecured loss mitigation loans originated by GMACM. ETS has applied for necessary licenses relating to these loans.

- 2) Fannie Mae Homesaver Advance (HSA) Loans

HSA was a Fannie Mae loss mitigation program from 2008 until 2010 under which an unsecured loan would be made to the borrower in the form of an advance (funded by GMACM and reimbursed by Fannie Mae) to cure the delinquency on a GMACM serviced loan. The servicing of the unsecured HSA loan would be immediately transferred to a third party servicer on behalf of FNMA. GMACM does not have records of the number of HSA loans originated by GMACM as the loans were immediately servicing transferred before any payments were due.

Unsecured loans that GMACM/ ETS service fall into three categories:

- 1) Loss mitigation notes referenced above that were originated by GMACM and are (or were until late last year) serviced by ETS.
- 2) a recently acquired portfolio of about 15,000 HSA loans that were transferred by FNMA from its third party servicer to GMACM due to poor performance of the third party servicer. The loans are generally delinquent and are servicing transferred out at about 120 days delinquent. GMACM only acquired loans for states in which it was licensed to service unsecured loans or in which its collections vendor Sykes is licensed to service unsecured loans.
- 3) The Energy Loan Program was a Fannie Mae initiative. It provided loans for home improvements intended to improve energy efficiency of the borrower's home. The note for an Energy Loan is not secured by any type of lien or encumbrance on either the originally-mortgaged property or any other real or personal property of the borrower or any third party. All of the Energy Loans came to us for collections/servicing after the loans had been charged off and the agreement with Fannie Mae is a pure collections agreement. The Agreement is technically between GMACM and FNMA but the collections work is being done by ETS.

**Pending Applications**

The following is a list of Sellers' pending license applications:

ETS

- Massachusetts Debt Collection License: Licensing is currently compiling application requirements. This application has not yet been filed with the state.
- North Carolina Collection Agency Licensing: Licensing is currently compiling application requirements. This application has not yet been filed with the state.
- Nebraska Collection Agency: Licensing is working with business and legal on in-state office location. This application has not yet been filed with the state.

The licenses above were all requested for the unsecured loan licensing project.

GMACM

- Minnesota Regulated Lender: This license was recently identified due to potential repurchase activity.
- Hawaii Exempt Out of State Collection Agency: Application has been filed and is pending with the state.
- Indiana License Lender: Application has been filed and is pending with the state.
- Maine Debt Collection License: Application has been filed and is pending with the state.
- Michigan Collection Agency: Application has been filed and is pending with the state.
- Pennsylvania Consumer Act Discount Licensing: Application has been filed and is pending with the state.
- Nebraska Collection Agency: Licensing is working with business and legal on in-state office location. This application has not yet been filed with the state.

The licenses above (except MN) were all requested for the unsecured loan licensing project.

RFC

- Massachusetts Third Party Loan Servicer Registration: Application has been filed and is pending with the state. This license was identified for master servicing activity.
- New York Mortgage Servicer Registration: Application has been filed and is pending with the state. This license was identified for master servicing activity.
- Minnesota Regulated Lender: Research with Legal on license applicability. This license was recently identified due to potential repurchase activity.

Sellers routinely obtain, renew or surrender mortgage origination and servicing licenses in the Ordinary Course of Business due to loan officer turnover and branch office openings and closings.